

reasonable settlement administration and notice costs; and 4) pay reasonable, Court-approved attorneys' fees, expenses, and named plaintiff service awards, up to agreed-upon limits.

The Financial Institution Plaintiffs move for an order: (1) preliminarily approving the proposed settlement; (2) preliminarily certifying the proposed settlement class; (3) approving the proposed notice program; and (4) scheduling a final approval hearing.

In further support of their motion, the Financial Institution Plaintiffs submit a memorandum of law, a proposed preliminary approval order; the Joint Declaration of Class Counsel Gary F. Lynch and Joseph P. Guglielmo; the proposed settlement agreement and its various attachments—such as the proposed notices and claim form—(attached as Exhibit A); and a Declaration of Richard W. Simmons, from the proposed Settlement Administrator, Analytics Consulting LLC.

Plaintiffs respectfully request that this Motion, which Equifax does not oppose, be granted.

Dated: May 15, 2020

Respectfully submitted,

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Financial Institution Plaintiffs' Steering Committee

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This brief was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 15th day of May, 2020.

s/ Gary F. Lynch

Gary F. Lynch

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

s/ Gary F. Lynch

Gary F. Lynch